

IN THE SUPREME COURT OF THE STATE OF NEVADA

WAYNE MICHAEL CAMERON,
Appellant.

v.
STATE OF NEVADA,
Respondent.

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Feb 18 2022 04:21 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Case No. 83531

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S
OPENING BRIEF AND APPENDIX (SECOND REQUEST)**

COMES NOW, Appellant, WAYNE MICHAEL CAMERON, and moves
this Honorable Court for an Order granting him an extension of time until Friday,
March 11, 2022 within which to file his Opening Brief and appendix.

This is the second request for extension of time. The good cause is
established in the accompanying Declaration of Counsel.

The undersigned certifies that he has communicated with both Mr. Cameron
and Jennifer Noble, Chief Appellate Deputy, counsel for Respondent. Neither has
an objection to the granting of this Motion.

This Motion is brought pursuant to NRAP 26(b)(1), 27(b) and (c), and
31(1)(A).

DATED this 18th day of February, 2022.

Respectfully submitted,
RICHARD F. CORNELL, P.C.
150 Ridge Street, 2nd Floor
Reno, Nevada 89501
By: /s/RichardCornell
Richard F. Cornell

DECLARATION OF COUNSEL

STATE OF NEVADA)
)ss.
COUNTY OF WASHOE)

RICHARD F. CORNELL, being first duly sworn, and under penalty of perjury, declares as follows:

1. Your Declarant is counsel for the Appellant, Wayne Cameron.
2. Your Declarant makes this Declaration in support of his Motion for Extension of Time (Second Request).
3. The basic reason for seeking this request is because the undersigned has been inundated as a ghost writer by counsel of record in the case of Mack v. Garrett, a very complicated appeal to the United States Court of Appeals for the Ninth Circuit. What the undersigned thought would be a one week project has turned out to be a six week-and-counting project.
4. Even so, I was able this month to get a 15-page Reply Brief to the Ninth Circuit done on time in Fichman v. Mercer, and a 32-page Opening Brief also done on time to this Court in Jenkins v. State, out of Douglas County. Additionally, the undersigned agreed to handle a Nevada State Bar grievance for an old-time colleague of mine, and currently that case is set for evidentiary hearing on Monday, February 28, 2022.

5. The undersigned has been reviewing the transcript in this case. The jury trial was 9 days long and the undersigned has reviewed five days of the proceeding as well as pre-trial proceedings.

6. The reason the undersigned has not sought 30 days is because the undersigned will be on vacation the week of March 13, 2022. The undersigned will endeavor to get this brief done and filed, along with the appendix, by March 11, 2022.

7. Absent further interruptions, the undersigned believes that he should be able to get the Opening Brief and appendix filed by March 11, 2022.

Your Declarant swears and declares under penalty of perjury that the foregoing assertions of fact are true and correct.

DATED this 18th day of February, 2022, and executed under penalty of perjury in the city of Reno, county of Washoe, state of Nevada.

RichardCornell
RICHARD F. CORNELL

CERTIFICATE OF SERVICE

The undersigned does hereby swear and declare under penalty of perjury that they are an employee of RICHARD F. CORNELL, P.C., and that on the 18th day of February, 2022, they caused a true and correct copy of the preceding document to be served upon all necessary parties by way of electronic service through the Court's E-flex filing system, addressed as follows:

Jennifer Noble, Appellate Deputy
Washoe County District Attorney's Office
Appellate Division
jnoble@da.washoecounty.us

DATED this 18th day of February, 2022.

/s/KathrynOBryan
Kathryn O'Bryan